

## UNITED STATES DISTRICT COURT

FILED

for the

Eastern District of Missouri

OCT 27 2015

In the Matter of the Search of )  
 the Priority Mail Express parcel bearing tracking number )  
 EL006200455US, addressed to: "Terrance Richardson, 1541 )  
 Ben McLemore 3 Place, St. Louis, MO 63133," and a return )  
 address of: "Uncle Elroy Richardson, 6030 Wortham Way, )  
 Houston, TX 77033."

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

Case No. 4:15 MJ 6274 (TCM)

## APPLICATION FOR A SEARCH WARRANT

I, Curtis Brassel, a federal law enforcement officer or an attorney for the government request a search warrant and state under penalty of perjury that I have reason to believe that on the following property: *the Priority Mail Express parcel bearing tracking number EL006200455US, addressed to: "Terrance Richardson, 1541 Ben McLemore 3 Place, St. Louis, MO 63133," and a return address of: "Uncle Elroy Richardson, 6030 Wortham Way, Houston, TX 77033,"*

located in the EASTERN District of MISSOURI, there is now concealed controlled substances and/or United States currency.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, U.S.C., §§ 846, 841(a)(1)	Conspiracy to possess with intent to distribute controlled substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

- Continued on the attached sheet.
- Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

CURTIS BRASSEL, Postal Inspector  
United States Postal Inspection Service

Printed name and title

Sworn to before me and signed in my presence.

Date: October 27, 2015

Judge's signature

Hon. Thomas C. Mummert, U.S. Magistrate Judge

Printed name and title

AUSA: JOHN T DAVIS

City and State: St. Louis, MO

AFFIDAVIT

I, Curtis Brassel, being duly sworn, state the following:

01. I am a Postal Inspector with the United States Postal Inspection Service. I have been employed by the United States Postal Inspection Service for approximately twelve (12) years. I have received training by the U.S. Postal Inspection Service (USPIS) in the investigation of controlled substances or proceeds/payments being transported through the United States. The St. Louis Field Office's Multi-Functional Team has intercepted numerous parcels which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity. Prior to my employment with the Postal Inspection Service, I was employed by the Ladue Police Department for approximately two (2) years and the Webster Groves Police Department for approximately one (1) year.

02. I also rely upon the training and experience of other members of the USPIS St. Louis, Missouri Narcotics Team. The team is comprised of four members, one of whom have been assigned to narcotics for at least twelve (12) years. The St. Louis Narcotics Team has intercepted in excess of one thousand – five hundred parcels, which were found to have contained controlled substances or the proceeds of controlled substance sales.

03. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U. S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail - two day delivery), reliability, free telephone and Internet parcel tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business to business, correspondence. Intelligence from prior parcels, which were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an individual to an individual. Express Mail is seldom used for individual to individual correspondence.

04. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for

shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of Federal Express and United Parcel Service are similar to U. S. Postal Service Express Mail and Priority Mail. Like U. S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service are favored because of the speed, reliability, free telephone and Internet parcel tracking service, as well as the perceived minimal chance of detection. Like U. S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service were originally intended for urgent, business to business, correspondence. However, intelligence from prior parcels which were found to contain controlled substances or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. Federal Express and United Parcel Service are seldom utilized to convey individual to individual correspondence.

05. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of controlled substances. The USPIS conducted an analysis of prior parcels mailed through overnight delivery services, which were found to contain controlled substances or proceeds/payments of controlled substance sales. The analysis of prior parcels, which were found to contain controlled substances or proceeds/payments, indicated that these labels are usually from an individual to an individual. In the few cases when overnight delivery parcels containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company. Additionally, this analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the parcel will contain a controlled substance or the proceeds of controlled substance sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U. S. Postal Service Express Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: parcel mailed from or addressed to a narcotic source city; parcel has a fictitious return address; parcel addressee name is unknown at the destination address; parcel sender name is unknown at the return address; parcel has address information which is handwritten; parcel is mailed from a Commercial Mail Receiving Agency (CMRA); parcel is addressed to residential areas; parcel is addressed from an individual to an individual; parcels are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the parcel is mailed is different than the ZIP Code used in the return address.

06. The U.S. Postal Inspection Service St. Louis Field Office's Multi-Functional Team has found the characteristics listed in paragraphs three, four, and five are indicative of parcels, which have been found to contain illegal controlled substances or the proceeds/payments for controlled substances.

07. On Saturday, October 24, 2015, during a routine review of parcels at the St. Louis, Missouri USPS Network Distribution Center (NDC) in Hazelwood, Missouri, I identified the following Priority Mail Express parcel: Priority Mail Express parcel with tracking number **EL006200455US** was addressed from: **Uncle Elroy Richardson, 6030 Wortham Way, Houston, TX 77033** addressed to **Terrance Richardson, 1541 Ben McLemore 3 Place, St. Louis, MO 63133**. The postage label indicated that the parcel was mailed on October 23, 2015 from the Houston, TX 77072 Post Office, with a postage fee of \$54.00 Upon observing the parcel, I immediately noted that the mailing label was addressed person-to-person, bore a handwritten label, and was originating from Houston, TX; a known source area for narcotics. Due to these contributing factors, I detained the parcel for further investigation.

08. On October 24, 2015, I reviewed available USPS and law enforcement databases regarding the sender and addressee information listed on the parcel. According to available databases, "Elroy Richardson" was not a name associated to the address of 6030 Wortham Way, Houston, TX 77033. In the past, packages originating from source narcotics cities listing a fictitious sender name are parcels which in the past have contained narcotics and or the proceeds of narcotics. The listed addressee name "Terrance Richardson" is not a name associated with the delivery address of 1541 Ben McLemore 3 Place, St. Louis MO. In the past, packages originating from source narcotics cities listing a fictitious addressee name are parcels which in the past have contained narcotics and or the proceeds of narcotics.

09. I reviewed available USPS business records and noted the mailer for Priority Mail Express parcel **EL006200455US** utilized cash for their postage fee payment of \$54.00. Priority Mail Express is typically associated to business correspondence mailings which are primarily paid for via credit card or debit card. Due to the characteristics associated with the parcel, I requested a K-9 review of Priority Mail Express parcel **EK006200455US**.

10. On October 26, 2015, Florissant Missouri Police K-9 Officer Mike Arthur was contacted and responded to the Postal Inspection Service Office in St. Louis, Missouri. Officer

Arthur was accompanied by his narcotic trained canine "Hugo". The Priority Mail Express parcel, bearing number **EL006200455US**, was placed in an area known not to have been previously contaminated by a narcotic odor. Officer Arthur had "Hugo" search this area. Upon arriving at this parcel, Officer Arthur advised that canine "Hugo" reacted in a positive manner, indicating the presence of a narcotic odor.

11. The parcel is described as a brown, USPS Ready Post cardboard box, measuring approximately twelve (12) inches by ten (10) inches by eight (8) inches, weighing approximately four (4) pounds, fourteen (14) ounces. Based on my training and experience, as well as the training and experience of other members of the USPIS, Saint Louis, Missouri Narcotics Team, I know that the size and weight of this parcel, coupled with other indicators (i.e. fictitious sender/addressee name, positive reaction by a narcotic trained canine, etc.) are indicative of other parcels which have been found in the past to contain narcotic substances, or monies which are the proceeds/payments of narcotic trafficking.

12. Based upon my training and experience, I believe there is probable cause to suspect that the target package contains narcotics and/or the proceeds/payments of narcotics trafficking. I believe said evidence is contraband and/or evidence of violations of Title 21, United States Code, Sections 841(a)(1) and 846, or Title 18, United States Code, Sections 1956 and 1957.

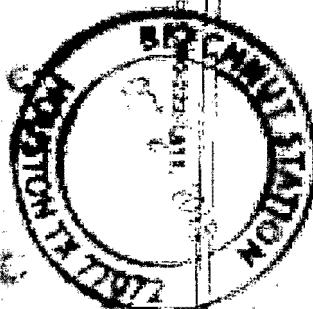
13. The parcel is currently in the custody of Postal Inspector C. A. Brassel located within the Eastern District of Missouri. Attached herewith is a photocopy of the Priority Mail Express label bearing number **EL006200455US**, as well as a copy of the qualifications for Officer Arthur's canine "Hugo."

14. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public, I am requesting that this affidavit be sealed until further order of the Court.

WRITE

ADDRESS

For Pictures or Letters from Canada  
Write to Postmaster, Ottawa, Ontario, Canada,  
or to Postmaster, Montreal, Quebec, Canada.



PRIORITIES FOLLOW THE POST

PRIORITY  
MAIL

UNITED STATES  
POSTAL SERVICE

POSTAGE PAID  
CANADA



Florissant Police Department  
Bureau Of Field Operations: K9 Unit  
Canine Probable Cause Affidavit of Qualifications  
Handler: Officer Michael Arthur, DSN 570  
Canine: "Hugo"

I, Officer Michael Arthur, DSN 570, have been a Commissioned Police Officer of the Florissant Police Department since January 7<sup>th</sup>, 2008. I have completed the Missouri P.O.S.T. Law Enforcement Academy requirements and have been a canine handler for a one and a half years. I am currently working with my first canine partner.

Canine Hugo is my present canine. Canine Hugo is a black and tan German Shepard and was born on June 6<sup>th</sup>, 2012. Canine Hugo and I attended and completed the "Basic Police Canine Training Course for Narcotics", from January 20<sup>th</sup>, 2014 through April 25, 2014. This course was held at St. Louis Metropolitan Police Department: Police Canine School, located in St. Louis, MO. The training course consisted of fourteen weeks of instruction in narcotics training and canine searches of buildings, lockers, vehicles, and luggage. Canine Hugo and I were certified through the St. Louis City Police Canine School as a Narcotics Detection Dog Team on April 25<sup>th</sup>, 2014.

In addition to the above mentioned training, Canine Hugo has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, Marijuana, MDMA (Ecstasy), and their derivatives. Canine Hugo alerts to the aforementioned narcotics in a aggressive manner. Hugo squares up the source of the odor and culminates the alert by scratching or otherwise aggressively touching (biting) at the source of the odor.

Canine Hugo was recertified on October 31st, 2014 by the National Police Canine Association. Canine Hugo was also recertified on May 8<sup>th</sup>, 2015 by the North American Police Work Dog Association. Since Canine Hugo has been in service, he has conducted numerous sniffs which led to locating small and large amounts of narcotics and arrests. Several of Canine Hugo's sniffs have led to the issuance and execution of search warrants where large amounts of narcotics were found.

Canine Hugo and I train a minimum of 16 hours per month in the area of narcotic detection with the St. Louis City Metropolitan Canine Unit, among other training groups to include the St. Louis County Police Department Canine Unit. This affidavit is current as of June 15th, 2015.

*Officer Michael Arthur, DSN 570*  
Officer Michael Arthur, DSN 570  
Florissant Police Department  
Bureau of Field Operations: K9 Unit  
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Florissant, MO 63033  
314-831-7000